

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

QUINTRELL MARTIN,

Defendant.

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Case No. 2:06-cr-0155-MHT

MOTION FOR ISSUANCE OF SUBPOENAS

COMES NOW the defendant, Quintrell Martin, pursuant to Rule 17 (a)(b) and (c) of the Federal Rules of Criminal Procedure and 18 U.S.C. § 3006A (e)(1), and respectfully moves this Honorable Court for an Order permitting the issuance of the following requested subpoenas and requiring the costs of the witnesses' transportation, subsistence and witness fees be paid at Government expense.

Defendant, pursuant to Rule 17 (a)(b) and (c), Federal Rules of Criminal Procedure, requests the issuance by this Court of an Order requiring service of the following subpoenas at the Government expense upon:

1. Calvin Williams
Assistant District Attorney
District Attorney's Office
251 S. Lawrence Street
Montgomery, AL 36104
2. Scott Green
Assistant District Attorney
District Attorney's Office
251 S. Lawrence Street
Montgomery, AL 36104

Said subpoenas should require the above-named witnesses to appear and testify at the reduction of sentence hearing in the United States District Court for the Middle District of Alabama, One Church Street, Montgomery, Alabama, on January 23, 2008, at 2:00 P.M.

In further support hereof, the defendant shows the following:

1. The defendant was adjudged indigent under the provision of the Criminal Justice Act of 1964, and the undersigned was appointed to represent him.
2. The testimony of the witnesses is material to preparing a defense in that they will testify to the facts and circumstances surrounding the allegations against the defendant.

WHEREFORE, Defendant respectfully requests that this Motion be granted and the Court issue an order **requiring service of subpoenas by the U.S. Marshal** upon the aforementioned witnesses, with witness fees and costs of transportation and subsistence to be provided at Government expense.

Dated this 14th day of January, 2008.

s/ Richard K. Keith
RICHARD K. KEITH (KEI003)
Attorney for Defendant
KEITH & DUBIN, P.C.
22 Scott Street
Montgomery, AL 36104-4012
Telephone: (334) 264-6776
Facsimile: (334) 265-5362

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Verne H. Speirs, AUSA
Post Office Box 197
Montgomery, AL 36101-0197

s/ Richard K. Keith

OF COUNSEL